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2
3 THE HONORABLE JUDGE RICARDO S. MARTINEZ
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

10 DERICK D'HAITI,

11 Plaintiff,

12 NO. 2:20-CV-00358-RSM

13 v.
14 PHILIPS NORTH AMERICA LLC d/b/a
15 PHILIPS HEALTHCARE, a Delaware
limited-liability company; ABC Company and
XYZ Company,

STIPULATED MOTION AND ORDER
FOR CONTINUANCE OF DEADLINE TO
JOIN ADDITIONAL PARTIES

NOTE FOR MOTION CALENDAR:
June 11, 2020

16 Defendants.

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18 **STIPULATED MOTION**

19 The parties in the above-captioned action, Derick D'Haiti (hereinafter "Plaintiff") and
20 Philips North America LLC d/b/a Philips Healthcare (hereinafter "Philips"), by and their
21 undersigned counsel of record, hereby submit this stipulated motion pursuant to LCR 10(g) to
22 continue the dead to join additional parties from June 15, 2020 to August 15, 2020.

23 Plaintiff in this matter alleges that on December 24, 2018, while working at a Philips
24 building, he slipped and fell on a freshly waxed floor. Plaintiff further alleges that he suffered
25 injuries because of the fall and that the incident was caused due to Philips negligent actions.

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STIPULATED MOTION FOR CONTINUANCE OF
DEADLINE TO JOIN ADDITIONAL PARTIES
(CAUSE NO. 2:20-CV-00358-RSM) – Page 1

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1 Philips is attempting to identify the individuals who waxed the floor and their employer
2 and requests an additional sixty (60) days to identify the individual's employer and join it as a
3 potential party in this litigation. This is the parties first request for an extension of case
4 deadlines and is not the result of lack of diligence, as the parties have exchanged written
5 discovery and are awaiting responses.

6 Therefore, the parties stipulate to a continuance of the deadline to join additional parties
7 from June 15, 2020 to August 15, 2020.

8

9 **IT IS SO STIPULATED:**

10 EMERALD LAW GROUP, PLLC

11 *s/ Donna L. Mack*

12 Donna L Mack, WSBA No. 30875
Attorney for Plaintiff

HOLT WOODS & SCISCIANI LLP

s/ Charissa R. Williams

13 Anthony R. Scisciani III, WSBA No. 32342
Kelsey L. Shewbert, WSBA No. 51214
Charissa R. Williams, WSBA No. 54879
14 Attorneys for Philips North America LLC
d/b/a Philips Healthcare

15 **IT IS SO ORDERED:**

16 Based on the foregoing Stipulation, IT IS HEREBY ORDERED that the deadline to join
17 additional parties shall be continued until August 15, 2020.

18 DATED this 12th day of June, 2020.
19

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23 RICARDO S. MARTINEZ
24 CHIEF UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington, that the following is true and correct:

I am employed by the law firm of Holt Woods & Scisciani LLP.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
<u>CO / Plaintiff</u>	<input type="checkbox"/> Via U.S. Mail
Donna L. Mack, WSBA No. 30875	<input checked="" type="checkbox"/> Via E-Mail
Emerald Law Group, PLLC	<input type="checkbox"/> Via Facsimile
811 1 st Avenue, Suite 510	<input type="checkbox"/> Via Overnight Mail
Seattle, WA 98104-1428	<input checked="" type="checkbox"/> Via CM/ECF
	donna@emeraldlawgroup.com

DATED this 11th day of June, 2020.

s/ Jessica Heath
Jessica Heath, Legal Secretary

**STIPULATED MOTION FOR CONTINUANCE OF
DEADLINE TO JOIN ADDITIONAL PARTIES
(CAUSE NO. 2:20-CV-00358-RSM) – Page 3**

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